### IN THE UNITED STATES BANKRUPTY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	
	Chapter 13

ANDREW C. BONEY

Debtor Case No.: 22-11226-AMC

# DEBTOR'S OBJECTION TO CERTIFICATION OF DEFAULT OF NATIONSTAR MORTGAGE, LLC

Debtor, Andrew C. Boney(hereafter :Debtor") responds to the Certification of Default of Nationstar Mortgage, LLC, as follows:

Denied. Debtor has sufficient funds to cure the current post-petition delinquency.

WHEREFORE, Debtor respectfully requests an Order denying Nationstar Mortgage, LLC relief from the Automatic Stay

Date: January 4, 2024

BY: /s/ Akeem J. Parsons

AKEEM J. PARSONS, EQUIRE SPEAR WILDERMAN, P.C. 230 S. Broad Street, 14<sup>th</sup> Floor Philadelphia, PA 19102 (215) 732-0101 (215) 7342-7790 (fax) aparsons@spearwilderman.com Attorney for Debtor

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#### **CERTIFICATE OF SERVICE**

I, AKEEM J. PARSONS, Attorney for Debtor, hereby certify that on the 4th day of January, 2024, I did serve a copy of the Objection to Certification of Default on the following individuals via regular mail and/or electronic notice as follows:

### **Electronic Notice**

KENNETH E. WEST ecfemails@ph13trustee.com, philaecf@gmail.com

UNITED STATES TRUSTEE USTPRegion03.PH.ECF@usdoj.gov

### **Counsel for Mortgage Company**

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Suite 5000
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representing Community Loan Servicing, LLC, a Delaware Limited Liability Company
Nationstar Mortgage LLC

Date: January 4, 2024

BY:/s/ Akeem J. Parsons
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